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# Two Perspectives on Inclusion In The United States

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## Abstract

The history of schooling for students with disabilities in the United States is marked by exclusion and, until the passage of the *Education for All Children Act* in the 1970s, a substantial number of students with disabilities were denied free public education and many more were poorly served by public schools. The requirement that all children be educated in the "least restrictive environment" gradually allowed many students with disabilities to be educated alongside their peers without disabilities and today a majority of students with disabilities spend more than 80% of their school days in regular classroom settings. Still, the meaning of inclusion is bitterly disputed, fueled in large part by two contrasting views of disability. This paper discusses these two views – a deficit stance and a social constructivist perspective – and the effects of these views on the meaning of inclusion, the purpose of inclusion, and how inclusive education is achieved.

## Keywords

inclusion, equity, deficit perspective on inclusion, social constructivist stance on inclusion

## Introduction

As we began writing this paper, the US Department of Education issued a clarification regarding the legal obligations of school districts to provide access to sports for students with disabilities. According to the new guidelines, school districts are "required to provide a qualified student with a disability an opportunity to benefit from the school district's program equal to that of students without disabilities" (in Pilon, 2013, p. D5). This ruling has been hailed by some as a significant moment in the movement to include students with disabilities into the *normal* life of US schools (Pilon, 2013).

However, the history of education for students with disabilities in the United States has, until relatively recently, been marked by exclusion, not inclusion. Prior to the enactment of the landmark *Education for All Children Act* (also known as Public Law 94-142), only one in five students with disabilities in the US were educated in public schools. Moreover, many states had laws on their books that explicitly excluded many students with disabilities from public schooling including children who had

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been labeled deaf, blind, emotionally disturbed, Education Programs, 2007). Other states "permitted" public school programs for certain groups of students with disabilities but did not require it. Before the implementation of Public Law 94-142, New York State, for example, permitted school districts to provide an education to students with IQs below 50 (Harrison, 1958). In the early 1970s, over one million children with disabilities in the US were completely excluded from public education and another 3.5 million were not receiving appropriate services (Martin, Martin, & Terman, 1996).

This situation changed with the passage of PL 94-142 which mandated that all students with disabilities be provided with "a free and appropriate education in the least restrictive environment" (Osgood, 2005, p. 105). Today nearly all students with disabilities spend at least part of their day being educated alongside children without disabilities (31st Annual Report to Congress on the Implementation of the *Individuals with Disabilities Education Act*, 2009). For some educators this represents a triumph of inclusive policies. Others view the increased presence of students with disabilities in regular educational settings merely as a step toward truly inclusive schools (Allen, 2006). These positions reflect fundamental differences in the meaning of inclusion and the means for achieving inclusive schools. Fleshing out the meaning of inclusion in an American context is the aim of this paper.

We begin by offering a brief history of inclusion in the United States drawing heavily on Robert Osgood's (2005) historical review of inclusion in the US. We then turn our attention to explicating two positions on inclusion that dominate discussions of inclusion in the United States. The first position we discuss is the deficit stance (sometimes referred to as the medical model) on disabilities that situates disabilities in the minds and bodies of students. We then consider the goals and rationale for inclusion that derive from this perspective as well as the means for achieving inclusion within a deficit framework. Next we take up a social constructivist view of disabilities that situates disabilities in the complex interaction between naturally occurring human differences and the sociocultural contexts of schooling. We then discuss the goals and rationale for inclusion that emerge from a social constructivist framework and how inclusion is achieved from this perspective. We give more space to the social constructivist perspective because it may be less familiar to many readers and because we find this stance more persuasive ourselves.

## History of Inclusion in The United States

The history of special education is typically understood in terms of the inexorable movement toward the integration of students with disabilities into regular education settings (Ainscow, 1999). Yet, the history of special education in the US has been marked mainly by segregation and exclusion. In his *History of Inclusion in the United States*, Robert Osgood (2005) observed that, until relatively recently, a significant proportion of students with disabilities in the US, especially students with intellectual disabilities, were considered uneducable. These students were completely excluded from public schooling. Even those students with disabilities who were considered to be "educable" were typically segregated within schools since it was presumed that these students had unique educational needs requiring the services of specially trained professionals. Historically educators resisted the integration of "exceptional" children who, because they did not fit into the rigid structures of American schooling, "overtaxed the efficient operation of schools" (p. 24). The

assumption was that the inclusion of students into regular educational settings would demand so much attention from teachers as to have a detrimental effect on the education of students without disabilities. Osgood cites instances of school superintendents who concluded that it was worth the higher costs of educating students with intellectual disabilities in segregated schools or classrooms given the negative effect their presence would have on the learning of "normal" children.

As early as the late 19th century there were, however, a few exceptions to the pattern of segregation and exclusion of students with disabilities. Osgood cites, for example, the cases of Batavia, New York and Newton, Massachusetts where assistant or unassigned teachers provided support for students with disabilities within regular classrooms. Still, Osgood emphasizes that the dominant trend in well into the 20th century was the removal of students with disabilities from the regular classroom. In many cases, students with disabilities continued to be excluded from public schooling altogether although some states did pass enabling legislation during this time that permitted, but did not require, school districts to educate certain categories of students with disabilities within public schools.

Despite the continuing pattern of exclusion and segregation of students with disabilities there were occasional calls that these students have at least social contact with children without disabilities. Some went even further. Osgood (2005) quotes principal and Illinois Council of Exceptional Children member Edward Stullken who wrote in 1950s, "in general, it is best not to segregate any individual by placement in a special group, if he may receive as good or better training in a normal group of pupils" (p. 45). Others began to question the efficacy of special class placement in general. In his classic article, "Special education for the mildly retarded – Is much of it justifiable?" Lloyd Dunn (1968) argued that "special education in its present form is obsolete and unjustifiable from the point of view of the pupils so placed" (Dunn, 1968, p. 6). Dunn was particularly concerned about the overrepresentation of minority students in special education classes, a problem that persists in the US (see Harry & Klingner, 2005).

Parental activism in the 1960s, along with court challenges to the practice of denying many children with disabilities a free public education, led to a rapid expansion of special education within public schools. For example, in *Pennsylvania Association for Retarded Children v. Commonwealth of Pennsylvania* (1971) a group of parents of whose children had been identified as mentally retarded successfully challenged a state law that absolved school districts of responsibility for educating students deemed to be "uneducable" or "untrainable" (Osgood, 2005, p. 104). The result of the case was that the state of Pennsylvania acknowledged its responsibility to provide all students with a free, appropriate education. Parents in the District of Columbia also challenged the exclusion of students with severe disabilities from public schooling resulting in a decision that the District of Columbia schools had to provide a free, appropriate education to all students regardless of the severity of their disabilities (Osgood, 2005).

The activism 1960s and 1970s on behalf of children with disabilities – including the normalization and deinstitutionalization movements – culminated in the landmark *Education for All Children Act* (Public Law 94-142) passed by the US Congress in 1975. Public Law 94-142, eventually renewed as the *Individuals with Disabilities Education Act* (IDEA), guaranteed a free education for all students with disabilities. PL 94-142 also required school districts to provide students with disabilities with Individualized Education

Programs (IEP) to insure that these students received an education program appropriate to their particular needs. IDEA goes further by specifying that students with disabilities be educated in the *least restrictive environment* (LRE).

> To the maximum extent appropriate, children with disabilities, including children in public or private institutions or other care facilities, are educated with children who are not disabled, and special classes, separate schooling, or other removal of children with disabilities from the regular educational environment occurs only when the nature or severity of the disability of a child is such that education in regular classes with the use of supplementary aids and services cannot be achieved satisfactorily. (quoted in Beratan, 2006)

Still, while many of children with disabilities moved into public schools they often remained segregated in special education classes (Osgood, 2005).

Osgood points to the emergence of the Disability Rights movement in the 1970s and 1980s in the increasing demand for inclusive placements as a matter of civil rights. The mid-1980s and early 1990s were also marked by the emergence of the Regular Education Initiative (REI) that called for ending the separate special education system and, instead, "turn[ing] the spotlight to increasing the capabilities of the regular school environment, the mainstream, to meet the needs of *all* students" (Stainback & Stainback, 1984, p. 110). Part of the problem according to advocates of the REI was the presumption that special education held the expertise for educating students with disabilities which often led regular educators to abdicate any responsibility for teaching students with disabilities (see collection of essays in Kerzner & Gartner, 1989 for an overview of the Regular Education Initiative).

Michalko (2008) observes that, despite the intention of PL 94-142 that all students with disabilities be educated in the least restrictive environment, since the passage of the *Education for All Children Act* there has been an "unfettered growth of overwhelmingly segregated arrangements" (p. 2133). Still, the most recent data indicate that the vast majority of students with disabilities in the US ages 6-21 spend at least part of their educational day in regular education settings. As of 2008, over 57% of students with disabilities spent at least 80% of their school day inside regular classrooms while just over 5% were completely excluded from regular school placements (31st Annual Report to Congress on the Implementation of the Individuals with Disabilities Eduation Act, 2009). In preschool settings nearly one-third of students with disabilities are included in "regular" early childhood settings as their primary placement and nearly the same percentage participate in segregated settings with another 15% spending some time in both regular and special education settings (Odom, Buysse, & Soukakou, 2011). Of course, these data say nothing about the quality of these placements in pre-school and K-12 settings.

One serious threat to the trend toward inclusion of students with disabilities in regular education settings may be found in the charter school movement. In a review of the effects of free-market schooling on students with disabilities, Dudley-Marling and Baker (2012) report that the available evidence indicates that students with disabilities, especially students with more severe disabilities, are significantly underserved by charter schools. Moreover, many charters enroll few, if any, students with disabilities. Dudley-Marling and Baker conclude that, in the context of free-market schooling with the emphasis on test scores and costs, students

with disabilities may have less value than students who raise test scores and cost less to educate. Charters, vouchers systems, and other free market initiatives represent a serious long-term threat to inclusive practices. School choice, in the name of the free market, "empowers each group to opt out of engaging with the others. Exclusivity is not a by-product of school choice, but a primary goal (Valle, Connor, Broderick, Bejoian, & Baglieri, 2011, p. 2291).

Despite these worries about the future impact of market-based schooling practices, overall, the evidence seems to indicate remarkable progress toward inclusion since the enactment of PL-142. In less than 40 years, US schools have gone from a time when many children with disabilities were completely excluded from public education to the current situation in which all students with disabilities receive a free, appropriate public education and most spend a significant portion of their school day in classrooms alongside peers without disabilities. However, as we argue below, the significance you attach to these developments depends on how you define disability (i.e., where disabilities reside) and your goals for inclusion. In the following section we discuss the meaning and goals for inclusion from the perspective of the deficit (or medical) model that has long dominated special education.

## A Deficit Perspective On Inclusion

Special education is undergirded by assumptions of normality – and abnormality. Specifically, it is widely assumed that human traits and abilities tend to cluster around a mean, that is, the norm(al). Some people are very tall, for example, and others are very short, but most people tend toward "average." In much the same way it is assumed that a relatively small proportion of people are highly intelligent and roughly the same proportion of people *possess* low intelligence with most people closer to average intelligence. Other human traits and abilities (e.g., vision, hearing, physical prowess, the ability to do math, read, write, etc.) are assumed to distribute in a similar fashion[1]. When people differ sufficiently from the norm on these various traits and abilities (generally two standard deviations above or below the mean) they are considered "exceptional" (or abnormal). The focus of special education is generally on those students situated on the lower reaches of the normal curve, students who are presumed *deficient* in one or more skills or abilities necessary for success in school and, often, the world outside of school. These children have disabilities.

This deficit gaze situates school failure in the minds and bodies of students who are presumed to be deficient in skills and abilities associated with school success. As Miller (1993) puts it, "the philosophy of deficiency takes the view that those whose performance deviates from the majority lack some critical attribute, ability, or potential" (Miller, 1993, p. 59). Students with learning disabilities, for instance, are viewed as deficient in particular skills underlying success in reading, math, writing and other school subjects. Moreover, it is assumed that these deficiencies are neurological in origin, literally in the heads of students (Hammill, Leigh, McNutt, & Larsen, 1981). Similarly, from a deficit perspective intellectual disabilities are defined as cognitive deficits and conditions like autism are understood in terms of social and linguistic deficiencies. Even students with physical and sensory impairments are defined in terms of *lacking* the visual, auditory, or motor capacities possessed by "normal" children.

From a deficit perspective, the overarching goal of special education is to provide students with the skills needed to function *normally* in a *normal* environment[2] – at least as far as possible. There are three

complementary approaches special educators typically employ to achieve this goal. One approach is to identify and then remediate deficiencies in student learning. A typical response to a reading disability, for example, is to identify the specific reading skills in which students are deficient and then remediate these deficits through the application of appropriate reading methods (Bartolome, 1994). A second approach is compensatory skill training in which students are taught strategies for overcoming – or compensating for – their deficiencies. For example, a student with a severe reading disability might be taught alternative strategies for gathering information. A third approach seeks to assist students with disabilities by making environmental and curricular accommodations. A student with a reading disability, for instance, may be given more time on tests or have certain materials read to them.

Remedial teaching, compensatory skills training, and the provision of accommodations offer different, but complementary, means for supporting students with disabilities so that they can achieve a measure of success in and out of school. However, in the context of deficit thinking, these approaches share the assumption that the problem(s) reside in the student, that is, it is part of the student's makeup and strategies must be brought to bear to overcome students' innate deficiencies. It is further assumed that it takes specially trained professional to address the uncommon needs of students with disabilities – the primary rationale for special education.

These assumptions about the nature of students with disabilities that emerge from a deficit stance inform a particular position on inclusion including what inclusion means, the rationale for including students with disabilities in regular classrooms, and the means for achieving inclusion. We take up these topics in the following sections.

**The Meaning of Inclusion**

From a traditional (deficit) special education perspective, the meaning of inclusion follows the legal requirement that students with disabilities be educated in the "least restrictive environment" (LRE). The assumption is that the regular classroom is the LRE for every child but not necessarily the most appropriate placement for all children (Hyatt & Filler, 2011). The regular classroom is the appropriate placement for students with disabilities if they are able to function in the regular classroom without significantly altering the regular education curriculum or student expectations (Scanlon & Baker, 2012). If students are not able learn the regular curriculum with supports, then their performance in class is taken as evidence that the regular classroom is not the appropriate placement for them (see Ferri, 2012). Following the principle that the regular classroom is not always the most appropriate setting for all students with disabilities all of the time, in many parts of the US inclusion is "procedurally defined as a student with an identified disability, spending greater than 80% of his or her school day in a general education classroom in proximity to nondisabled peers" **(**Baglieri et al., 2011, pp. 2125-2126).

From a deficit perspective, inclusion is linked to a service delivery model including the technical implementation of a set of research-based practices (Baglieri et al., 2011; Ferguson & Nusbaum, 2012). As Liasidou (2010) describes it, "the focus is on enabling disabled students to 'overcome' barriers to learning and participation by devising 'specialist' educational measures and interventions . . . intended to respond to students' right to education" (p. 171).

**The Rationale for Inclusion/Exclusion**

The principle of educating students in the least restrictive environment is about exclusion – students for whom the regular classroom is not the appropriate placement – as much as it is about inclusion. Therefore, the rationale for the LRE model tends to focus on justifying the claim that it is in the best interest of children with and without disabilities – as well as regular classroom teachers – that many children with disabilities need to be excluded from regular classroom setting for at least some of the time and that some children with disabilities be excluded from the regular classroom entirely. The focus on the inappropriateness of the regular education setting for at least some children with disabilities is, in part, a response to those who are seen as arguing for the full inclusion in the regular classroom of all students with disabilities, including students with severe disabilities (see, for example, Anastasiou & Kauffman, 2011).

Generally, the argument for the claim that the regular classroom is not always the most appropriate settings for students with disabilities focuses on the unique needs of students and the inadequacies of the regular classroom environment. Students with disabilities, it is argued, require the support of specially trained teachers who possess specialized knowledge that enables them to provide appropriate instruction geared to the particular needs of individual students (Anastasiou & Kauffman, 2011; Kilanowski-Press, Foote & Rinaldo, 2010). Regular classroom teachers, on the other hand, are assumed to lack the specialized knowledge and training necessary to meet the needs of students with disabilities. Even in cases where teachers possess the necessary training, large class sizes and inflexible curricula make it difficult for regular classroom teachers to accommodate the unique needs of students with disabilities (Kilanowski-Press, Foote & Rinaldo, 2010). It is also argued that the inclusion of students with disabilities in regular classrooms, by demanding disproportionate attention from teachers, will negatively affect the education of students without disabilities (Grider, 1995).

In general, advocates of educating students with disabilities in the least restrictive environment (which is often not the regular classroom) argue that what matters most is the *quality of instruction* provided for students with disabilities, not where this instruction is provided (e.g., Fuchs & Fuchs, 1994). Responding to critics of LRE who argue that exclusion of any child is inherently unjust (see below) supporters of LRE make the point that the provision of appropriate instruction in whatever environment is best for students with and without disabilities is fair and just. Gallagher (1994) asserts that fairness "does not consist of educating all children in the same place at the same time [and with the same curriculum] but in ensuring that the student has basic needs met and is traveling toward a well-thought-out career and a satisfying life style" (p.528). From this perspective, seeking inclusion at the perceived expense of effective instruction by thrusting students into environments for which they are unprepared – and which are unprepared for them – is neither fair nor just (Anastasiou & Kauffman, 2011).

**Implementing Inclusion from a Deficit Perspective**

For those taking a deficit stance on disabilities inclusion focuses on *best* instructional practices in the least restrictive environment which typically means at least some time spent outside the regular classroom. This process includes the *diagnosis* of children's learning problems (i.e., disabilities) in order to determine the most appropriate learning environment along a continuum of services ranging from totally

separate schools and classrooms at one end of the continuum to in-class support at the other end (Hyatt & Filler, 2011). Response-to-Intervention (RTI), for example, provides several "tiers" of support for students with disabilities based on how students respond to various instructional interventions (see Ferri, 2012). The diagnosis and evaluation process also enables special education professionals to select the most effective instructional strategies to remediate students' deficits based on the assessed needs of individual students with disabilities. In this framing, students' progress is marked by their movement along a continuum of services. This model also offers a role for parents who are expected to be included in the creation of Individual Education Plans (IEP) that are intended to insure that students' placement and instruction is appropriate to their individual needs (Narian, 2011).

In general, the LRE approach to inclusion, underpinned by deficit thinking, emphasizes technical solutions to the *problem* of disabilities. This typically includes specialized instruction tailored to the needs of students with disabilities with some attention to improving student behavior (Causton-Theoharis, Theoharis, Orsati, & Cosier, 2011); in-class modifications of methods and materials (Murphy, 1996; Scanlon & Baker, 2012) including the creation of distraction-free environments (Causton-Theoharis, et al., 2011); training in special education for regular classroom teachers (Osgood, 2005); and, co-teaching (regular and special education teachers (Scanlon & Baker, 2012). Universal Design for Learning is increasingly used to allow students with disabilities to more easily access the regular class curriculum without reducing the demands of the curriculum (Hunt & Andreasen, 2011) while helping students develop communication skills in a "natural" manner (Hart & Whalon, 2011). Supporting students with disabilities in the least restrictive environment often includes an emphasis on students' emotional development as well as academics, helping students learn how to form friendships with their peers, for example, as they are often "deficient" in social skills (Narian, 2011).

Devore, Miolo, and Hader (2011) provide an illustrative example of a typical deficit-based inclusion process in their case study of one preschool child's experience with Individual Education Plans (IEPs) and least restrictive environments. The special education teacher, the early childhood teacher, specialists, and consultants came together with the little boy's mother to design an IEP that would enable him to make friends and acquire some of the skills of a typical preschool curriculum, skills in which he was thought to be deficient. The researchers emphasized the need for 'buy in' from all the parties involved, as well as the need to trust each other's expertise, including that of the mother. The researchers found that this process was most effective when four key steps were followed. First, the group needed to build relationships with each other as they determined the roles and responsibilities of each member of the IEP team. Second, the team needed data in order to assess the boy's current abilities, which they gathered from the preschool as well as his family. Third, building upon his current abilities, the team needed to establish functional goals and strategies to mark the boy's progress. And finally, the team needed to apply these strategies as they monitored his progress. Throughout the process, the team wanted to design concrete, specific, almost prescriptive recommendations for the boy's cognitive and emotional development (Devore et al, 2011). This young boy received an education designed to directly address his perceived deficiencies (or disabilities). His education in his inclusive setting introduced him into the community in a gradual fashion by supporting his skills in the least restrictive

setting; designing, implementing and adjusting a specialized curriculum; and, measuring improvements in his behavior over time. Success was measured in small victories, such as when the boy was able to interact with his classmates and neighborhood children, a goal his mother in particular wanted to see for her son.

The emphasis on technical solutions to disabilities and the emphasis on "best practices" as determined by scientifically-based research (see, for example, Anastasiou & Kauffman, 2011) contrasts sharply with the social constructivist stance on inclusion which stresses structural reform over the individual remediation.

## A Social Constructivist Stance On Inclusion

Theory and research in disciplines such as cultural psychology (e.g., Cole, 1996; Gergen, 1990), sociolinguistics (e.g., Gee, 1996), feminist studies (e.g., Heilbrun, 1988), and anthropology (e.g., Geertz, 1979; McDermott, 1993) contradict the common-sense idea that learning resides "in the heads" of students (Luke & Freebody, 1997). These various disciplinary perspectives indicate that learning does not reside in the minds of autonomous individuals as much as it dwells in activities and cultural practices situated in the context of human relations and institutions (Gergen, 1990). Lynda Miller (1993) puts it this way: "the traditional concept of self [as autonomous individual] has been challenged by a group of scholars who believe that the self resides not only inside the person, but also in the relationships, actions, artifacts, and objects surrounding her" (p. 63). This notion of a "distributed self" locates learning in the "people, procedures, practices, events, and structures participating in and constituting the process we call 'education'" (Miller, 1993, p. 64).

If learning resides outside people's heads, that is, in "people, procedures, practices, events, and structures," so must learning problems. Gergen (1990) offers the following analysis of learning failure:

> By and large we may view the common practice of holding single individuals responsible for achievements or deficits in human understanding as an exercise in practical rhetoric. In the same way that it is inappropriate to allocate depth of insight to single scientists, authors, philosophers, or statesmen, it is also problematic to discredit failing students . . . for their failure in understanding. . . . Individuals are constituents of a complex array of relationships, and it is inappropriate from the present standpoint to disembed their actions from the relational sequence of which they are a part. (p. 587)

As McDermott (1993) explains it, no one can be disabled on their own. It takes a community of people doing just the right things in the right time and place for a student to be identified as disabled. Consider the following analogy to football inspired by Mehan (1993). Crossing the goal line counts as a touchdown only in the context of an activity recognized as football requiring a group of people performing actions conventionally associated with football (e.g., lining up, running plays), the presence of particular props (at a minimum an object designated as a "football"), something that can be recognized as a playing field (a field but not a living room), and an agreed upon set of rules (e.g., the location of the goal line that must be crossed for it to count as a touchdown). If one of us casually crosses the goal line while taking a shortcut through the football stadium on the Boston College campus, for example, this will

not count as a touchdown. It takes a group of people performing just the rights actions in the right time and place to perform the social practice of football. To be disabled also requires doing the right things at the right time and place including the presence of people authorized to adjudicate the performance of schooling. The behaviors associated with a learning disability, for instance, will only count as a learning disability if performed in the context of formal schooling in the presence of particular school officials (a teacher or school psychologist but not the janitor or school secretary). Without the application of the institutional machinery of schooling, educational disabilities do not exist (Mehan, 1993).

It is in this sense that disability is a social construction. This does not mean, however, that human differences do not exist (see Anastasiou & Kauffman, 2011 for a critical take on social constructivist models of disability). Clearly, deafness, blindness, physical impairments, and intellectual and learning disabilities represent observable human differences. Educators working from a social constructivist perspective on disabilities do not deny the existence of these differences. What they argue, however, is that these differences represent normal human variation, not evidence of disorders or deficiencies (Miller, 1993) and, for these naturally occurring human differences to count as disabilities, certain conditions must obtain. For instance, in the 18th century there was a high prevalence of deaf persons on Martha's Vineyard but, because sign language was widely used by both deaf and hearing individuals, deafness was neither salient nor disabling. It took the influx of outsiders who could not sign to disable the deaf on Martha's Vineyard (McDermott & Varenne, 1995). Similarly, it takes the presence of certain physical barriers to make various physical impairments disabled. And, in much the same way, it takes the institution of schooling to make a learning disability (McDermott & Varenne, 1995).

It is also not the case that a social constructivist stance denies the reality of categories of disability as some have suggested (see Anastasiou & Kauffman, 2011). Human beings experience their worlds as social and cultural beings for whom socially constructed identities are quite real. However, as we argue below, alternative constructions of social reality can make various human differences more or less salient.

Social constructivists share with educators taking a deficit perspective a desire that students with disabilities succeed in school. However, a social constructivist perspective leads to a very different approach for supporting students with disabilities. Social constructivists explicitly reject deficit thinking that continues to dominate special education and discussions of inclusion. Rather than focusing on deficits to be remediated or compensated for, social constructivists begin with a *presumption of competence* (Biklen, 2005). This is a philosophy of abundance that

> in contrast to the philosophy of deficiency, is based on capability and competence. It presumes an optimistic explanation for human thinking, learning, and ability. This abundance perspective assumes that each person, regardless of age, gender, economic circumstance, or geographic location, is constantly in the process of constructing meanings based on her or his own life experiences. (Miller, 1993, p. 57)

The belief that all children, regardless of their differences, are smart, competent learners leads to a different approach to inclusion for students with disabilities. Instead of focusing on low-level skills and research-based instruction aimed at remediating

students' deficits, a social constructivist stance seeks to challenge all students with the sort of rich, engaging common in classrooms serving the most academically successful students. The Optimum Learning Environment (OLE) project, for example, brought rich, engaging curriculum typically found in classes for gifted students to inner-city, ELL special education classrooms with great success (Ruiz & Figueroa, 1995) (see Dudley-Marling and Michaels [2012] for other illustrations of high expectation curricula). Such a stance does not, however, obviate the need for individualized support and direction for students with disabilities, often provided by special education teachers.

Social constructivism contrasts sharply with the deficit stance that dominates special education leading to a very different perspective on the meaning of inclusion, the rationale for including students with disabilities in regular classrooms, and the means for achieving inclusion of students with disabilities.

**The Meaning of Inclusion**

As noted earlier, in many places in the US inclusion is defined as students with disabilities spending more than 80% of their school day in regular education settings (Baglieri et al., 2011). From this perspective, inclusion necessarily entails some exclusion. The practice of limiting (some) students' participation in general education settings is consistent with the principle of educating students with disabilities in the *least restrictive environment* which presumes that regular classroom settings are not always the most *appropriate* placements for students with identified disabilities. The assumption here is that for many students with disabilities, because they are deficient in crucial skills and abilities, it is appropriate for them to be excluded from regular classroom settings for at least part of the school day. Put another way, students with disabilities are permitted access to regular education settings only when they have proven they can fit in, when they are able to perform within the "normal range" for their age.

Disability educators working from a social constructivist stance reject what they characterize as an assimilationist perspective on inclusion that establishes a hierarchy between those being assimilated and members of the group of (normal) students into which students with disabilities are being assimilated (Beratan, 2006). For these educators, diverse, inclusive classrooms ought to be the normal state of affairs. The onus is on school officials being able to demonstrate why some students should be excluded from regular education settings rather than having to show why they should be included (Brantlinger, 1997). In other words, these educators, informed by a social constructivist perspective, believe that the regular classroom should be considered the default setting for all children. This does not mean, however, that inclusion requires treating all students the same, ignoring differences between them (Hedge & MacKenzie, 2005; Morrier & Gallagher, 2011). Students with disabilities may require extra support to function in the regular classroom including the support of specially trained teachers. It does mean, however, that the verb *include* should refer to ALL students. As framed by the National Center on Inclusive Education (2011)

> Inclusive education is characterized by presumed competence, authentic membership, full participation, reciprocal social relationships, and learning to high standards by all students with disabilities in age-appropriate general education classrooms, with supports provided to students and teachers to enable them to be successful. (2011, p. 1)

**The Rationale for Inclusion**

Advocates for inclusion working from a social constructivist perspective point to a body of research evidence they believe supports the efficacy of inclusive practices (see Ben-Porath, 2012; Brantlinger, 1997; and, Causton et al., 2011 for reviews on the efficacy of inclusive schooling). For example, the National Center on Inclusive Education (2011) cites a longitudinal study of 11,000 students with disabilities which indicates that, for students with disabilities, more time spent in regular classrooms correlates with higher test scores in math and reading, fewer absences, and fewer referrals for disruptive behavior. Additionally, there is evidence that the presence of students with disabilities in the regular classroom does not negatively affect the academic performance of students without disabilities (Ferguson & Nusbaum, 2012; Hyatt, Iddings & Ober, 2005).

Educators working from a deficit perspective, on the other hand, often argue that inclusion does not work for many students with disabilities (Anastasiou & Kauffman, 2011), that the evidence on the efficacy of inclusive classrooms is at best mixed (Murphy, 1996). Advocates of inclusion are not indifferent to evidence on the effectiveness of inclusion. However, inclusive education is "first and foremost a political position" (Slee, 2011, p.14), part of a broad human rights agenda (Ben-Porath, 2012; Wilde & Avramidis, 2011). The inclusion movement is about the rights of disabled children – all children – to be educated in regular education settings alongside their peers (Liasidou, 2012). From a rights perspective "inclusion is not about disability, nor it is only about schools. Inclusion is about social justice" (Sapon-Shevin, 2003, p. 26). Liasidou (2012) summarizes this position well when he states that

> Inclusive education reflects values and principles and is concerned with challenging the ways in which educational systems reproduce and perpetuate social inequalities with regard to marginalized and excluded groups of students across a range of abilities, characteristics, developmental trajectories, and socioeconomic circumstances. Hence, inclusion is inexorably linked with the principles of equality and social justice in both educational and social domains. (p. 168)

Ultimately, inclusive education is a tactic, an aspiration, and a statement of value (Slee, 2011). There may be practical and pedagogical limits to inclusion (see Hansen, 2012) but the use of any exclusionary criteria will always impinge on the rights of children with disabilities.

**Including Students with Disabilities: Reforming the Structures of Schooling**

As we noted above, educators who aspire to the full inclusion of students with disabilities have been accused of denying human differences, of desiring to put an end to the special education enterprise as we have known it, returning to the "days of old" when many students with disabilities languished in regular classroom with teachers unprepared to provide students with "appropriate" instructional support (e.g., Anastasiou & Kauffman, 2011; Grider, 1995). It is true, as we discussed in a previous section, that educators working from a social constructivist perspective advocate for the inclusion of *all* students with disabilities in regular classrooms as a matter of principle. It is not true, however, that the aspiration to educate all students with disabilities in inclusive settings coincides with a desire to end the practice of supporting students with specially trained teachers. Nor does an inclusionist

perspective deny the importance of regular classroom teachers being trained to support ALL students, including students with disabilities. Certainly, no one believes (at least we hope not) that merely placing all students with disabilities in the regular education classrooms that produced so much failure in the first place is a good idea. The argument that disabilities – but not human differences – are socially constructed is based, in part, on the claim that it is the structures of contemporary schooling that transform naturally occurring human differences into disabilities by transforming certain (normal) human differences into abnormal deficiencies. McDermott (1993) observes, for example, that in US schools "we make something of differential rates of learning to the point that the rate of learning rather than the learning is the total measure of the learner" (p. 272). It is easy to imagine a different set of priorities that valued other measures of learning with the effect of altering our sense of intellectual and learning disabilities, for example. Indeed, McDermott (1993) argues that there are cultures that do not place such an emphasis on the rate of learning.

In any case, the mere physical presence of students with disabilities in regular education settings does nothing to undo the educational structures that create and perpetuate hierarchies of ability and disability (Ashby, 2012, p. 92). The fundamental question for social constructivists is: Inclusion in what? Social constructivists agree with critics of inclusion that it would be disastrous to place students with disabilities in unchanging schools and classrooms (Slee, 2011). But, social constructivists also argue that to create truly inclusive settings the restructuring of schools must go beyond mere technical solutions, curricular modifications, changes in the physical arrangements of schools and classrooms, the use of teacher aides, or alternative assessment practices that, together "fail to challenge the architecture of exclusion" (Slee, 2011, p. 108).

Social constructivists advocate a radical approach to inclusion based on the fundamental assumption that it is the structures of schooling, not students, which must change (Ashby, 2012; Chimbala & Fourie, 2012). They argue that the policy of educating students with disabilities in the "least restrictive environment" enshrined in IDEA reflects an "assimilationist" stance in which "the onus is on disabled students who, given the necessary 'supplementary aids and services,' must find a way to fit into 'the regular educational environment'" (Beratan, 2006, online). This reinforces the dominant narrative of schooling that valorizes normality which, for students with disabilities, demands overcoming or compensating for *their* differences. Social constructivists argue that it is the educational environment that must adapt to the child, not the other way around (Chimbala & Fourie, 2012). As Slee (2011) puts it, "inclusive school cultures require fundamental changes in educational thinking about children, curriculum, pedagogy and school organization" (Slee, 2011, p. 110).

For social constructivists, the project of inclusion is not limited to students with disabilities. Students' special educational needs are "inexorably linked with multiple and intersecting sources of disadvantage like ethnicity, social class, gender and poverty" (Liasidou, 2012, p. 168). Disability issues regularly intersect with issues of race, for example. Students of color continue to be overrepresented in special education (Harry & Klingner, 2005) and, equally disturbing, students of color with identified disabilities are much more likely to be excluded from the regular classroom. Over 25% of black students with disabilities, for instance, spend more than 60% of their day outside the regular classroom compared to only 14% of white students (31st Annual Report to Congress on the

Implementation of the Individuals with Disabilities Eduation Act, 2009). Race also affects how students experience disability (Petersen, 2009).

The evidence is fairly clear that the structures of modern schooling fail many students, not just students with disabilities. Michelle Fine (1991) noted that "in the United States, public schools . . . were never designed for low-income students or students of color" (p. 31). The intractability of the so-called achievement gap in which poor students and students of color significantly underperform relative to their more affluent, white peers (see National Assessment of Educational Progress, 2009) provides strong support for Fine's provocative claim. But it's not just poor students, students of color and students with disabilities who are not well served by the structures of schooling. There have been worries over the years that girls are not well served in math and science classes (American Association of University Women, 1992). More recently there has been a focus on the relative underachievement of boys relative to girls in K-12 classrooms (e.g., Newkirk, 2002). Osgood (2005) notes that advocates for the gifted also argue that the needs of exceptionally talented students cannot be adequately met in regular classroom settings.

Given the failure of the structures of modern schooling in the US, many American advocates for inclusion participate in the international disability studies discourse on inclusion that goes beyond students with disabilities (Baglieri et al., 2011). Ware (2004) nicely summarizes this position:

> To be inclusive requires that we strive to identify and remove all barriers to learning for all children. This means that we must attend to increasing participation not just for disabled students but for all those experiencing disadvantage, whether this results from poverty, sexuality, minority ethnic status, or other characteristics assigned significance by the dominant culture in their society. (p. 2)

In general, "inclusive education is code for educational reform at all levels" (Slee, 2011, p. 122).

Creating inclusive environments for all students is an aspiration, a problem to be solved. In the long term this will require the dismantling of the institutional structures of schooling that never even imagined students with disabilities, students of color, or even girls for that matter. Rigid, age-graded curriculum, normative testing practices, and tracking and ability grouping will never be congenial to the human diversity that exist in every school and classroom. In the place of these normalizing structures, we need to create new institutional structures that offer welcoming spaces for all students, acknowledging and building on the competence of all children regardless of their differences and the communities from which they come.

Realistically, this is a long-term political project that will encounter significant resistance from groups that benefit from current structures of schooling. Therefore, more immediate strategies are required for creating more welcoming, inclusive classrooms within existing structures of schooling. Significantly smaller class sizes would help. Allington and McGill-Franzen (1989) argue that small class sizes could mitigate the need for identifying students as disabled. Workshop structures for reading and writing that provide teachers with opportunities to provide individual support and direction for students as needed (see Dudley-Marling & Paugh, 2004, 2009, for example) are also helpful. Universal Design for Learning (UDL) seeks to "leverage technology's power to make education more

inclusive and effective . . . by offering [learners] 1) multiple means of representation . . . 2) multiple means of expression . . . and 3) multiple means of engagement" (Rose, Meyer & Hitchcock, 2005). Culturally-relevant pedagogies acknowledge and build on the linguistic and cultural knowledge all students bring with them to school (Gay, 2000, 2002). Most important is replacing deficit thinking that begins with the assumption of pathology with a stance that begins with the assumption that all students are competent learners entitled to the same rich, engaging curriculum provided to the highest achieving students.

Ultimately, as Slee (2011) reminds us, the exclusion of students with disabilities is the consequence of a series of decisions. From a social constructivist perspective, the project of inclusion is about identifying and then challenging these decisions with the goal of doing better for all students in our schools.

## Conclusion

We have presented two perspectives on inclusion, each underpinned by sharply different, non-compatible notions of disability. The deficit perspective, which continues to dominate in special education and, perhaps, American schooling more generally situates disability in the minds and bodies of students with the concomitant that inclusion focus on helping students to overcome deficiencies in order to fit into *normal* school settings. A social constructivist perspective on inclusion focuses on cultural and social contexts that transform naturally occurring human differences into disabilities. Here the focus is on reforming the structures of schooling. It is worth mentioning at this point that not all groups have embraced the practice of inclusion however defined. Members of the deaf community and some advocates for gifted education prefer segregation to inclusion (Osgood, 2005).

Given these dramatically different perspectives it is unsurprising that the debate about inclusion have become increasingly antagonistic. We do not doubt, however, that educators of students with disabilities, whatever their perspective on inclusion, are committed to doing what is best for students with disabilities. However, we believe that exclusion, for whatever reasons, will always sit uncomfortably with the principles of participatory democracy cherished by all Americans.

## Notes

1. In reality, only random events like the throw of the dice distribute along a normal, bell-shaped curve. Human traits and abilities are never random and, therefore, never distribute "normally" (see Gallagher, 2010 for a detailed discussion of unsuitability of the normal curve as a model for describing human variation).
2. To be fair, while the institution of special education is dominated by deficit models of learning there are many special educators who have rejected deficit thinking.

**References**

Allen, J. (2006). Failing to make progress? The aporias of responsible inclusion. In E. Brantlinger (Ed.), *Who benefits from special education: Remediating (fixing) other people's children* (pp. 27-43). Mahwah, NJ: Erlbaum.

Ainscow, M. (1999). *Understanding the development of inclusive schools*. London: Falmer Press.

Allington, R. L., & McGill-Franzen, A. (1989). Different programs, indifferent instruction. In D. Lipsky A. Gartner (Eds.), *Beyond separate education: Quality education for all* (pp. 75-98). Baltimore, MD: Brookes.

American Association of University Women. 1992. *How schools shortchange girls.* Washington, D.C.: Author.

Anastasiou, D. & Kauffman, J.M. (2011). A social constructionist approach to disability: Implications for special education, *Exceptional Children, 77*(3), 367-384.

Ashby, C. (2012). Disability Studies and Inclusive Teacher Preparation: A Socially Just Path for Teacher Education.

*Research and Practice for Persons with Severe Disabilities 37*(2), 89-99.

Baglieri, S. Bejoian, L.M., Broderick, A.A., Connor, D.J., Valle, J. (2011). [Re]Claiming "Inclusive Education" toward Cohesion in Educational Reform: Disability Studies Unravels the Myth of the Normal Child. *Teachers College Record, 113*(10), 2122-2154.

Bartolome, L. I. (1994). Beyond the methods fetish: Toward a humanizing pedagogy. *Harvard Educational Review, 64,* 17–194.

Ben-Porath, Sigal (2012). Defending Rights in (Special) Education. *Educational Theory 62*(1), 25-39.

Beratan, G. (2006). Institutionalizing inequality: Ableism, racism, and IDEA. *Disability Studies Quarterly, 26*(2). Retrieved from http://www.dsq-sds.org

Biklen, D. (2005). *Autism and the myth of the person alone*. New York: University Press.

Brantlinger, E. (1997). Using ideology: Cases of nonrecognition of the politics of research and practice in special education**,** *Review of Educational Research, 67,* 4-25-459.

Causton-Theoharis, J., Theoharis, G., Orsati, F., & Cosier, M. (2011). Does self-contained special education deliver on its promi ses?A critical inquiry into research and practice. *Journal of Special Education Leadership, 24*(2), 61-78.

Chimbala, R. & Fourie, E. (2012). Trekking Back to Mainstream for Inclusive Education, Is It There? *Educational Studies 38*(2), 175-187.

Cole, M. (1996). *Cultural psychology: A once and future discipline*. Cambridge, MA:Belknap Press.

Devore, S., Miolo, G., & Hader, J. (2011). Individualizing inclusion for preschool children using collaborative consultation. *Young Exceptional Children, 14*(4), 31-43

Dudley-Marling, C. & Baker, D. (2012). The effect of market-based school reform on students with disabilties. *Disability Studies Quarterly, 32*(2). Retrieved from http://dsq-sds.org/article/view/3187/3072

Dudley-Marling, C. & Michaels, S. (2012). *The power of high expectation curricula: Helping all students succeed with powerful learning*. New York: Teachers College Press.

Dudley-Marling, C. & Paugh, P. (2004). *A classroom teacher's guide to struggling readers*. Portsmouth, NH: Heinemann.

Dunn, L.M. (1968). Special education for the mildly retarded – is much of it justifiable? *Exceptional Children, 35*, 5-22.

Ferguson, P.M. & Nusbaum, E. (2012). *Disability Studies: What Is It and What Difference Does It Make? Research & Practice for Persons with Severe Disabilities, 37*(2), 70-80

Ferri, B.A. (2012). Undermining inclusion? A critical reading of response to intervention (RTI), *International Journal of Inclusive Education, 16*(8), 863-880.

Fine, M. (1991). *Framing dropouts*. Albany, NY: State University of New York Press.

Fuchs, D., & Fuchs, L. S. (1994). Inclusive schools movement and the radicalization of special education reform. *Exceptional Children, 60*, 294-309.

Gallagher, J. J. (1994). The pull of societal forces on special education. *The Journal of/Special Education, 27,521-530*.

Gallagher, D. (2010). Educational researchers and the making of normal people. In C. Dudley-Marling & A. Gurn (Eds.), *The myth of the normal curve* (pp. 25-38). New York: Peter Lang.

Gay, G. (2000). *Culturally responsive teaching: Theory, research and practice*. New York: Teachers College Press.

Gay, G. (2002). Preparing for culturally responsive teaching. *Journal of Teacher Education, 53*(2), 106-116.

Gee, J.P. (1996). *Social linguistics and literacies: Ideology in discourses* (2nd ed.) Bristol, PA: The Falmer Press.

Geertz, C. (1979). From the native's point of view: On the nature of anthropological understanding. In P. Rabinow & W.M. Sullivan (Eds.), *Interpretive social science* (pp. 225-241). Berkeley, CA: University of California Press.

Gergen, K.J. (1990). Social understanding and the inscription of self. In J.W. Stigler, R.A. Shweder, & G. Herdt (Eds.), *Cultural psychology: Essays on comparative development* (pp. 569-606). New York: Cambridge University Press.

Grider, J. R.(1995). Full Inclusion: practitioner's perspective. *Focus on Autism and Other Developmental Disabilities, 10*(4), 1-11.

Hammill, D. D.D., Leigh, J.E., McNutt, G., & Larsen, S.C. (1981). A new definition for learning disabilities. *Learning Disability Quarterly, 4*, 336-342.

Hansen, J.N. (2012). Limits to inclusion. *International Journal of Inclusive Education 16*(1), 89-98.

Harrison, E. (November 15, 1958). *"Parents bid state aid all retarded: Classes should not be only for those of plus-50 IQ, legislators are told."* New York, N.Y.Harry, B. & Klingner, J. (2005). *Why are so many minority students in special education? Understanding race & disability in schools. New York: Teachers College Press. education? Understanding race & disability in schools*. New York: Teachers College Press.

Hart, J. E. & Whalon, K. J. (2011). Creating social opportunities for students with autism spectrum disorder in inclusive settings.

*Intervention in School and Clinic, 46*(5), 273-279

Hedge, N. & MacKenzie, A. (2012). Putting Nussbaum's Capability Approach to Work: Re-Visiting Inclusion. *Cambridge Journal of Education 42*(3), 327-344

Heilbrun, C. (1988). *Writing a woman's life*. New York: Ballantine.

Hunt, J. H. & Andreasen, J. B. (2011). Making the most of Universal Design for Learning. *Mathematics Teaching in the Middle School 17*(3), 166-172.

Hyatt, K. J. & Filler, J. (2011). LRE Re-examined: Misinterpretations and unintended consequences. *International Journal of Inclusive Education, 15*(9), 1031-1045.

Hyatt, K.J., Iddings, C.D., & Ober, S. (2005). Inclusion: A Catalyst for School Reform. *Teaching Exceptional Children Plus, 1* (3), Retrieved [January 14, 2013] from http://escholarship.bc.edu/education/tecplus/vol1/iss3/2

Kerzner-Lipsky, D. & Gartner, A. (1989). *Inclusion and school reform: Transforming America's classrooms*. Baltimore, MD: Brookes.

Kilanowski-Press, L., Foote, C.J., & Rinaldo, V. (2010). Inclusion classrooms and teachers: a survey of current practices. *International Journal of Special Education, 25*(3), 43-56.

Liasidou, A. (2012). Inclusive Education and Critical Pedagogy at the Intersections of Disability, Race, Gender and Class, *Journal for Critical Education Policy Studies 10*(1), 168-184.

Luke, A. & Freebody, P. (1997). Shaping the social practices of reading. In S. Muspratt, A. Luke, & P. Freebody (Eds.), *Constructing critical literacies: Teaching and learning textual practices* (pp. 185-225). Cresskill, NJ: Hampton Press.

Martin, E.W., Martin, R. & Terman, D.L. (1996). The legislative and litigation history of special education. *Special Education for Children with Disabilities, 6*(1), 25-39.

McDermott, R.P. (1993). The acquisition of a child by a learning disability. In S. Chaiklin & J. Lave (Eds.), *Understanding practice: Perspectives on activity and context* (pp. 269-305). New York: Cambridge University Press.

McDermott, R. & Varenne, H. (1995). Culture "as" disability. *Anthropology & Education Quarterly, 26*, 324-348.

Mehan, H. (1993). Beneath the skin and between the ears: A case study in the politics of representation. In S. Chaiklin & J. Lave (Eds.), *Understanding practice: Perspectives on activity and context* (pp. 241-268). New York: Cambridge University Press.

Michalko, R. (2008). Double trouble: Disability and disability studies in education. In S. L. Gabel & S. Danforth (Eds.), *Disability and the politics of education: An international reader* (pp. 401–415). New York: Peter Lang.

Miller, L. (1993). *What we call smart: A new narrative for intelligence and learning*. San Diego: Singular Publishing Group.

Morrier, M. J., & Gallagher, P. A. (2011). Disproportionate representation in placements of preschoolers with disabilities in Five Southern states. *Topics in Early Childhood Special Education, 31*(1), 48-57.

Murphy, D.M. (1996). Implications of Inclusion for General and Special Education. *Elementary School Journal 96*, (5), 469-493.

Naraian, S. (2011). Pedagogic voicing: The struggle for participation in an inclusive classroom. *Anthropology & Education Quarterly 42*(3), 245-262.

National Assessment of Educational Progress (NAEP) (2009). *The nation's report card: Reading highlights 2007*. Washington, DC: National Center for Educational Statistics.

National Center on Inclusive Education (2011). Rationale for and research on inclusive education. Durham, NH: Institute on Disability at the University of New Hampshire. Retrieved at http:// iod.unh.edu/PriorityAreas/inclusive-education/about_ NCIE.aspx

Newkirk, T. (2002). *Misreading masculinity: Boys, literacy, and popular culture.* Portsmouth, NH: Heinemann.

Odom, S.L., Buysse, V., & Soukakou, E. (2011). Inclusion for Young Children With Disabilities: A Quarter Century of Research Perspectives, *Journal of Early Intervention, 33*(4), 344-356.

Osgood, R.L. (2005). *The history of inclusion in the United States*. Washington, DC: Gallaudet University Press.

Petersen, A. J. (2009). Ain't nobody gonna get me down: An examination of the educational experiences of four African American women labeled with disabilities. *Equity & Excellence in Education, 42*(4), 428-442.

Pilon, M. (January 26, 2013). Sports access for disabled is clarified, *New York Times*, D5.

Rose, D.H. Meyer, A., & Hitchcock, C. (Eds.) (2005). *The universally designed classroom: Accessible curriculum and digital technologies*. Cambridge, MA: Harvard Education Press.

Ruiz, N. & Figueroa, R. (1995). Learning-handicapped classrooms with Latino students: The optimal learning environment (OLE) project, *Education and Urban Society, 27*, 463-483.

Sapon-Shevin, M. (2003). Inclusion a matter of social justice. *Educational Leadership, 61*(2), 25–28.

Slee, R. (2011). The irregular school: Exclusion, schooling and inclusive education. New York: Routledge.

Scanlon, D. & Baker, D. (2012). An Accommodations Model for the Secondary Inclusive Classroom, *Learning Disability Quarterly, 35*, 212-224.

Stainback, W. & Stainback, S. (1984). A rational for the merger of special and regular education, *Exceptional Children, 51*(2), 102-111.

US Department of Education (2009). *31st annual report to Congress on the implementation of the Individuals with Disabilities Education Act*. Washington, DC: Author.

US Office of Special Education Programs, Office of Special Education and Education Rehabilitative Services, US Department of Education (2007). *History of twenty-five years of progress in educating children with disabilities through IDEA*. Washington, DC: Author.

Valle, J. Connor, D.J., Broderick, A.A., Bejoian, L.M., & Baglieri, S. (2011). Creating Alliances Against Exclusivity: A Pathway to Inclusive Educational Reform, *Teachers College Record, 113*(10), 2283-2308.

Ware, L. (Ed.). (2004). *Ideology and the politics of (in)exclusion*. New York: Peter Lang.

Wilde, A., & Avramidis, E. (2011). Mixed feelings: Towards a continuum of inclu sive pedagogies, *Education, 39*(1), 83-101.

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